OhioEPA
State of Ohio Environmental Protection Agency

Northwest District Office

347 North Dunbridge Rd.
Bowling Green, OH 43402-9398

TELE: (419) 352-8461 FAX: (419) 352-8468
www.epa.ohio.gov

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

April 12, 2010

Mr. Scott Landis
Plant Supervisor
DuPont Automotive
1930 Tremainsville Road
Toledo, Ohio 43613

Re: *Groundwater Inspection Report*
DuPont Automotive Products
1930 Tremainsville Road
Toledo, Ohio 43613
OHD 005 041 843

Dear Mr. Landis:

The DuPont Automotive Products (DuPont) Toledo, Ohio facility formerly manufactured automotive paints until 1994 and currently manufactures resins to support other DuPont paint making facilities. The site began operation in 1919 as the Mountain Paint and Varnish Company, until it was acquired by DuPont in 1934. The approximately 17 acre facility is located at 1930 Tremainsville Road, and consists of several manufacturing buildings, warehouses, outdoor tank farms, and an outdoor storage pad. Most of the production areas of the site are covered with concrete and asphalt.

The Division of Hazardous Waste Management (DHWM) has requested that the Division of Drinking and Ground Water (DDAGW) perform a field inspection at DuPont to determine (1) if they have in place, a ground water monitoring system that has been adequately designed, operated, and maintained to comply with applicable portions of the final closure performance standards of OAC Rule 3745-55-11 and (2) whether ground water sampling procedures and monitoring well integrity will ensure that the system is capable of obtaining representative ground water samples. Monitoring well integrity and maintenance was evaluated using OAC Rule 3745-9-03 as a framework.

The outdoor container storage pad is on a rectangular concrete slab with approximate dimensions of 180 x 400 feet long. The storage pad is located on the north side of the main plant area, adjacent to the north tank farm (see attached copy of Figure 2, and aerial photograph). The center of the storage pad is approximately 700 feet south of Tifft Creek. The storage pad formerly held containerized hazardous wastes on a designated portion of the pad known as F-Row.

The wastes stored at F-Row consisted of waste paint containing heavy metals, acrylic intermediates and other types of paint resins, various solvents (aromatic, ketone, and chlorinated), oils, boiler fuels, paint sludge, and asbestos insulation.

A container storage pad closure plan submitted January 18, 1996, for the DuPont Automotive Products, Toledo, Ohio was reviewed for DHWM by DDAGW. Comments on the above closure plan suggested that a delineation of the sand deposits found under the storage pad should be completed. DHWM also had comments on the documentation regarding the decontamination of the pad, and manifesting of the waste taken off-site.

DuPont submitted an April 27, 1998, response to the January 23, 1997, DDAGW/DHWM comments cited above. DDAGW reviewed the April 27, 1998, "Amended Closure Plan" and found that DuPont proposed to collect additional vertical extent samples from previous boring locations. Additional lateral extent of soil contamination samples were also proposed to be collected as presented in a subsequent follow up letter from DuPont dated May 18, 1998.

In 2002, two conference calls took place between DuPont, DDAGW, and DHWM. The purpose of the conference calls was to discuss Ohio EPA comments on the two documents referenced above, in an effort to expedite the review process.

The geophysical survey field work was completed during the week of September 23-25, 2002. The next phase of field work took place in December 2002, during a period of unusually cold weather. The soil sampling program involved the completion of 26 borings at the container storage area (CSA) F-Row unit, and five borings at the Tank 13 unit. The hydrogeologic portion of this phase of the field work involved the installation of 37 soil borings which were completed as one inch diameter piezometers.

The investigation report was submitted to the Ohio EPA on April 1, 2003. DDAGW provided comment on the investigation report to DHWM in an IOC dated May 7, 2003. Subsequent to the May 7, 2003, IOC, a series of internal meetings and conference calls ensued between the Ohio EPA and DuPont. DuPont provided a written response to the Ohio EPA comments in a letter dated October 17, 2003. DDAGW provided DHWM with a written response to the October 17, 2003, DuPont letter in an IOC dated December 12, 2004.

Another conference call took place with DuPont on February 26, 2004, and Ohio EPA requested that DuPont submit a revised closure report which would address all the previous Ohio EPA comments from the fall of 2003.

The first amended closure report, was submitted to the Ohio EPA on July 1, 2004. A number of deficiencies were noted in regard to soil sampling and the need to install ground water monitoring wells at both the CSA and Tank 13. DHWM issued a NOD letter to the facility dated May 13, 2005. DuPont then submitted a second revised amended closure plan, dated October 6, 2005, which contains the ground water sampling and analysis plan in Appendix D.

DDAGW visited DuPont at various times during the summer and early fall of 2006 to observe ground water monitoring sample collection and field implementation of the SAP. The wells were recently installed prior to observing the various sample events. The following are the DDAGW's findings from the inspections.

Recommendations

1. **All observed sampling procedures were in accordance with DuPont's approved ground water SAP. DHWM and DDAGW recommend that none of the existing ground water monitoring wells be plugged or abandoned as it would be disadvantageous to do so.** The existing network of wells across the site covers areas other than the two RCRA units, the former container storage pad and the former location of above ground Tank 13. According to DuPont, these monitoring wells are part of a larger effort to monitor a comprehensive site wide ground water monitoring network in connection with RCRA Corrective Action at the facility.

If you have any questions, please feel free to contact Dale McLane at (419) 373-3099.

Sincerely,

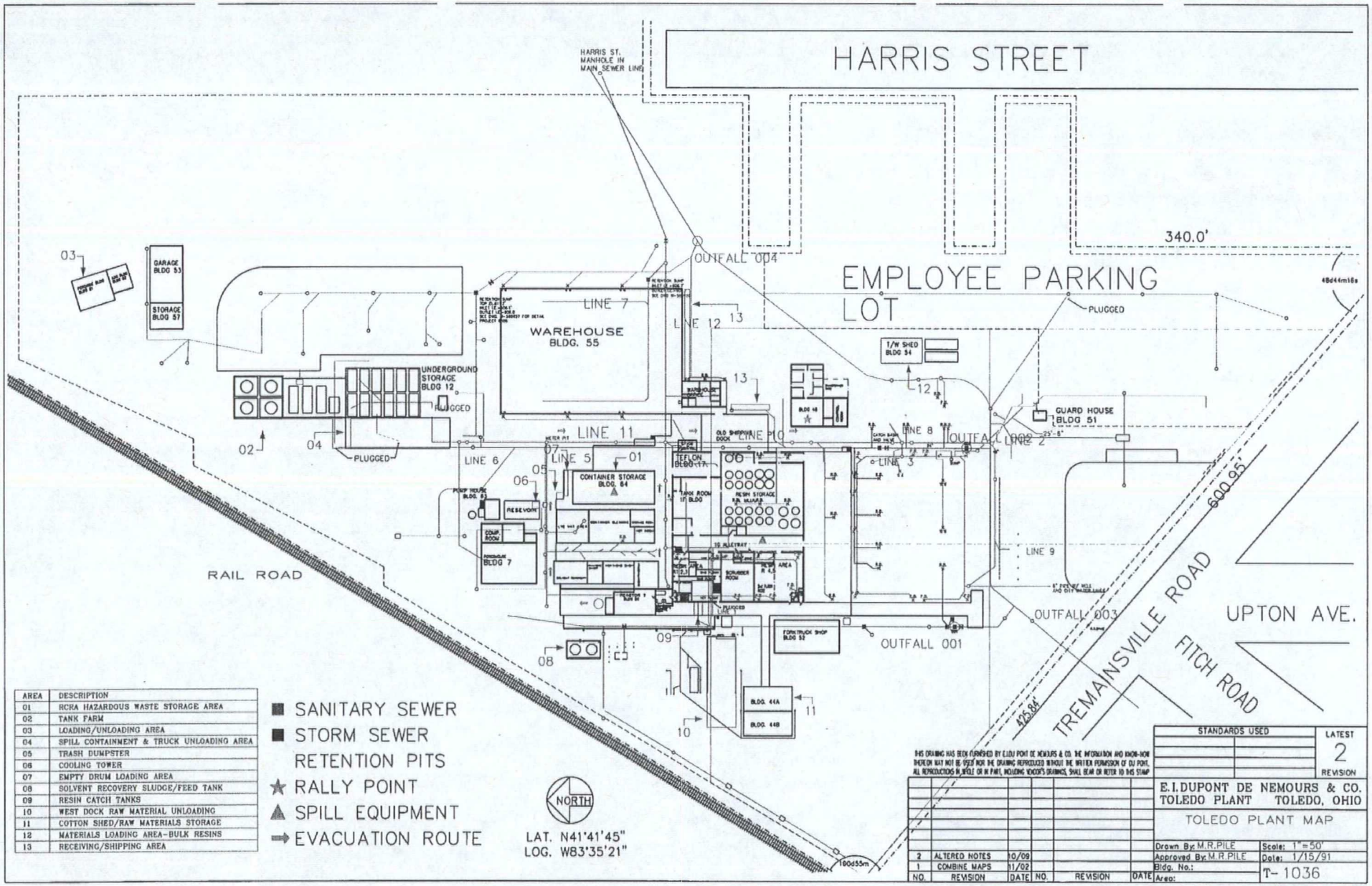
Janis D'Amico

Janis D'Amico
Division of Hazardous Waste Management
Northwest District Office

/llr

pc: DHWM-NWDO File: DuPont, General, Lucas County

ec: Michael Terpinski, DHWM, NWDO
John Weaver, DDAGW, NWDO
Dale McLane, DDAGW, NWDO
Janis D'Amico, DHWM, NWDO



AREA	DESCRIPTION
01	RCRA HAZARDOUS WASTE STORAGE AREA
02	TANK FARM
03	LOADING/UNLOADING AREA
04	SPILL CONTAINMENT & TRUCK UNLOADING AREA
05	TRASH DUMPSTER
06	COOLING TOWER
07	EMPTY DRUM LOADING AREA
08	SOLVENT RECOVERY SLUDGE/FEED TANK
09	RESIN CATCH TANKS
10	WEST DOCK RAW MATERIAL UNLOADING
11	COTTON SHED/RAW MATERIALS STORAGE
12	MATERIALS LOADING AREA-BULK RESINS
13	RECEIVING/SHIPPING AREA

■ SANITARY SEWER
■ STORM SEWER
RETENTION PITS
★ RALLY POINT
▲ SPILL EQUIPMENT
➡ EVACUATION ROUTE

NO.	REVISION	DATE	NO.	REVISION	DATE
2	ALTERED NOTES	10/09			
1	COMBINE MAPS	11/02			

STANDARDS USED	LATEST 2 REVISION

E.I.DUPONT DE NEMOURS & CO.
TOLEDO PLANT TOLEDO, OHIO

TOLEDO PLANT MAP

Drawn By: M.R.PILE	Scale: 1"=50'
Approved By: M.R.PILE	Date: 1/15/91
Bldg. No.:	T-1036
Area:	

Ohio | Environmental Protection Agency

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

January 11, 2011

Mr. Sathya Yalvigi
Project Director
DuPont Corporate Remediation Group
4417 Lancaster Pike
CRP 715/218
Wilmington, Delaware 19805

RE: ***RCRA Closure of Tank 13 and the Container Storage Pad***
DuPont Automotive Products
OHD 005 041 843

Dear Mr. Yalvigi:

On December 14, 2010, the Ohio Environmental Protection Agency (Ohio EPA) forwarded an e-mail to DuPont which included correspondence between the Ohio EPA Division of Hazardous Waste Management (DHWM) and the United States EPA (U.S. EPA), Region 5. The purpose of forwarding DuPont this e-mail was to confirm the inclusion of the Tank 13 and Container Storage Pad (CSP) RCRA Closure units as part of the ongoing federal-lead RCRA Corrective Action at the facility. The decision was based primarily on the reasoning that, due to the presence of comingled contamination at the facility, a comprehensive site-wide investigative approach is more efficient to address contamination at the individual units.

On December 13, 2010, Tank 13 and the CSP were recorded in RCRAInfo as being referred to Corrective Action per Ohio Administrative Code (OAC) 3745-55-10. This referral effectively ends the RCRA Closure process and the necessity to certify Closure of the two units. DuPont does not need to send Ohio EPA additional information concerning the units.

If you have any questions regarding this letter, please feel free to call Janis D'Amico at (419) 373-3064.

Sincerely,

Janis D'Amico

Janis D'Amico
Division of Hazardous Waste Management

/cs
pc: Cindy Lohrbach, NWDO-DHWM
DHWM, NWDO Lucas County File: DuPont Automotive
Christopher Black, U.S. EPA, Region 5
ec: Michael Terpinski, NWDO-DHWM
Janis D'Amico, NWDO-DHWM
Dale McLane, NWDO-DDAGW
Ed Lim, CO, DHWM

Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402-9398

419 | 352 8461
419 | 352 8468 (fax)
www.epa.ohio.gov

PARSONS

Memorandum

31 December 2009

From: Joe Peterlin, Parsons Project Manager

To: Sathya Yalvigi, DuPont Project Director

Subject: DuPont Toledo Automotive Products
December 2008 – April/May 2009 Investigation
Summary Report

INTRODUCTION

The Sitewide Investigation for the DuPont Automotive Products Facility (site), located at 1930 Tremainsville Road in Toledo, Lucas County, Ohio (see Figures 1 and 2), was conducted in accordance with Item 11(c) of the Administrative Order on Consent (Order) to E.I. du Pont de Nemours and Company (DuPont) under Section 3008(h) of the Resource Conservation and Recovery Act (RCRA) as amended by the Hazardous and Solid Waste Amendments (HSWA) of 1984, 42 U.S.C. Section 6928(h), effective July 1, 2008. The field investigation was also performed in accordance with the "Site-Wide Investigation Work Plan for the DuPont Automotive Products, Toledo, Ohio Facility" (DuPont, November 2008). This memorandum provides a brief summary of the results, including notes on the implementation of and field deviations from the work plan under which this field investigation was performed. An analysis of the data contained in this summary report will be conducted as part of the CA 725 and CA 750 reports.

BACKGROUND

Based on current and past operations (as described in the Current Conditions Report [CCR], [DuPont, August, 2008]), 74 solid waste management units (SWMUs) and/or areas of concern (AOCs) were identified at the Toledo facility as follows:

- Previously used to treat, store, or dispose of hazardous waste or constituents
- Previously impacted by the treatment, storage, or disposal of hazardous waste or constituents

Of these:

- A total of 64 units were recommended for no further investigation because they have a low potential for a release according to the visual site inspection (VSI) or because an investigation into conditions at the unit has already been undertaken and additional investigation is unnecessary.
- Ten units ("high potential units", Table 1) were recommended for further investigation because they have a high potential for, or confirmation of, a release directly to soil, groundwater, or surface water or because they lack sufficient information to ascertain if releases to the environment have occurred.

Additional investigation of these units was undertaken in the sitewide investigation that was completed in 2008 and 2009. The sitewide investigation was designed to investigate soil and groundwater and the investigation included a grid-like approach to evaluate the potential impact from all units, regardless of whether they were identified for

further investigation in the CCR. In addition, an ecological habitat assessment was conducted as part of the sitewide investigation.

WORK PLAN

The overall work plan objectives were to:

- Collect additional soil and groundwater data from the 10 high potential SWMUs/AOCs recommended for further investigation in 2008 CCR
- Perform a sitewide investigation using a grid-like approach that incorporated the potential impact from all units, regardless of whether they were identified for further investigation in the CCR
- Further investigate sitewide groundwater conditions

The scope of work included drilling the following borings:

- 38 biased borings proposed to investigate high potential units
- 108 grid sample borings proposed to investigate sitewide conditions

SITEWIDE INVESTIGATION ACTIVITIES PERFORMED IN 2008 AND 2009

Work Plan Implementation

- A total of 307 soil samples (plus 26 duplicates) were collected from 103 locations at depths of 0 to 9.3 feet (Table 2).
- Eleven new wells were installed (bringing the total number of monitoring wells to 40). Of these,
  - Three wells were installed in the A-Zone
  - Eight wells were installed in the D-Zone
- Forty groundwater monitoring wells were sampled
- Soil and groundwater samples were analyzed for volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), metals, and polychlorinated biphenyls (PCBs) (groundwater only)

Deviations from the work plan included the following:

- Some borings were relocated and some were not drilled due to various reasons (see Table 2);
- PCB soil samples were not collected from AOC 9; and
- Due to insufficient sample volume, VOCs were the only constituents analyzed in BDW-02.

RESULTS

Results of the sitewide investigation are summarized in Tables 3 through 7. Boring logs are included as Appendix A. Full data results are presented in Appendices B (soil) and C (groundwater). Figures 3 through 5 show the potentiometric surfaces and groundwater elevations for each water producing zone as measured in 2009. Data evaluations were performed for and may be found in the CA 725 and CA 750 Forms that are being submitted in December 2009.

Soil Results

DuPont Automotive Toledo facility soil samples were analyzed for VOCs, SVOCs and metals in 2008 and 2009. The constituents detected in soils are detailed in the attached Table 4. The most frequently detected VOCs were: acetone, benzene, toluene, carbon disulfide, xylenes, and ethylbenzene. The most frequently detected SVOCs in soil were the polycyclic aromatic hydrocarbons (PAHs), with chrysene, benzo(b)fluoranthene, benzo(ghi)perylene, pyrene, fluoranthene, naphthalene, and phenanthrene being the most frequently detected PAHs. All analyzed inorganics were detected in at least one or more samples, with the following metals being detected in every sample: arsenic, barium, chromium, cobalt, copper, lead, nickel, vanadium and zinc.

Groundwater Results

A total of 40 wells were sampled in April / May 2009. Results are summarized below according to the water producing zone as described in the 2008 Work Plan. Note that metals were analyzed for both dissolved and total metals. In general, the total metals concentrations were greater than the measured dissolved concentrations. The greater total metal concentrations in groundwater samples are likely the result of suspended solids from the geologic formations that may have entered the wells through the sand pack and well screen during well development or sampling.

Zone A:

The constituents detected in Zone A groundwater are detailed in Table 5. The most frequently detected constituents in Zone A groundwater were the metals, with barium being detected in every sample. No VOCs were detected in Zone A groundwater. The most frequently detected SVOCs in Zone A groundwater were fluoranthene, phenanthrene and pyrene.

Zone B:

The constituents detected in Zone B groundwater are detailed in Table 6. The most frequently detected constituents in Zone B groundwater were the metals, with barium and arsenic being the most frequently detected compounds. No VOCs were detected in Zone B groundwater. The most frequently detected SVOCs in Zone B groundwater were fluoranthene and phenanthrene. Each of the other SVOCs were only detected in one sample in the Zone B groundwater.

Zone D:

The constituents detected in Zone D groundwater are detailed in Table 7. The most frequently detected constituents in Zone D groundwater were the metals, with barium, arsenic and antimony being the most frequently detected compounds. No VOCs were detected in Zone D groundwater. The most frequently detected SVOCs in Zone D groundwater were phenanthrene, pyrene, chrysene and benzo(b)fluoranthene.

DISCUSSION AND CONCLUSIONS

Based on the sitewide investigation results, no new areas or constituents have been identified requiring further investigation and each of the high potential SWMUs/AOCs have been adequately characterized except for the lack of PCB soil data for AOC 9. Additional PCB soil data will need to be collected from AOC 9 to investigate this data gap.

Results of the ecological habitat assessment showed that no significant ecological receptors or habitats were present at the site and no further ecological investigations are recommended. A copy of the ecological assessment is included as Appendix D.

Based on the results of the sitewide investigation, locations BS-12 and BS-13 will be sampled for PCBs in soil to complete the 2008 Site-Wide Investigation Work Plan objectives. Additional samples may also be collected pending the results of the environmental indicators (EI) determination. This additional work will be detailed in a future work plan following approval of the EIs.

LIST OF ATTACHMENTS

Tables

Table 1	High Potential AOC Summary Evaluation
Table 2	Soil Sampling Summary
Table 3	Depth to Fluid Measurements
Table 4	Summary Statistics for 2008 and 2009 Soil Samples
Table 5	Summary Statistics for 2009 Groundwater Samples – Zone A
Table 6	Summary Statistics for 2009 Groundwater Samples – Zone B
Table 7	Summary Statistics for 2009 Groundwater Samples – Zone D

Figures

Figure 1	Site Location Map
Figure 2	Site Plan Showing Boring and Well Locations
Figures 3A/B	Potentiometric Surface, A-Zone (Measured in April-May and October 2009)
Figures 4A/B	Potentiometric Surface, B-Zone (Measured in April-May and October 2009)
Figures 5A/B	Groundwater Elevation Contours, D-Zone (Measured in April-May and October 2009)

Attachments

Attachment 1	Soil Boring logs
Attachment 2a	Analytical Results for Soils
Attachment 2b	Laboratory Analytical Reports for Soils
Attachment 3a	Analytical Results for Groundwater
Attachment 3b	Laboratory Analytical Reports for Groundwater
Attachment 4	Ecological Habitat Assessment

DOCUMENTATION OF ENVIRONMENTAL INDICATOR DETERMINATION

Interim Final

2/5/99

RCRA Corrective Action
Environmental Indicator (EI) RCRIS code (CA725)

Current Human Exposures Under Control

Facility Name: Axalta (formerly DuPont) Toledo Facility

Facility Address: 1930 Tremainsville Road, Toledo, Ohio

Facility EPA ID #: OHD 005- 041- 843

1. Has **all** available relevant/significant information on known and reasonably suspected releases to soil, groundwater, surface water/sediments, and air, subject to RCRA Corrective Action (e.g., from Solid Waste Management Units (SWMU), Regulated Units (RU), and Areas of Concern (AOC)), been **considered** in this EI determination?

X If yes - check here and continue with #2 below.
___ If no - re-evaluate existing data, or
___ if data are not available skip to #6 and enter"IN" (more information needed) status code.
___

BACKGROUND

Definition of Environmental Indicators (for the RCRA Corrective Action)

Environmental Indicators (EI) are measures being used by the RCRA Corrective Action program to go beyond programmatic activity measures (e.g., reports received and approved, etc.) to track changes in the quality of the environment. The two EI developed to-date indicate the quality of the environment in relation to current human exposures to contamination and the migration of contaminated groundwater. An EI for non-human (ecological) receptors is intended to be developed in the future.

Definition of "Current Human Exposures Under Control" EI

A positive "Current Human Exposures Under Control" EI determination ("YE" status code) indicates that there are no "unacceptable" human exposures to "contamination" (i.e., contaminants in concentrations in excess of appropriate risk-based levels) that can be reasonably expected under current land- and groundwater-use conditions (for all "contamination" subject to RCRA corrective action at or from the identified facility (i.e., site-wide)).

Relationship of EI to Final Remedies

While Final remedies remain the long-term objective of the RCRA Corrective Action program the EI are near-term objectives which are currently being used as Program measures for the Government Performance and Results Act of 1993, GPRA). The "Current Human Exposures Under Control" EI are for reasonably expected human exposures under current land- and groundwater-use conditions ONLY, and do not consider potential future land- or groundwater-use conditions or ecological receptors. The RCRA Corrective Action program's overall mission to protect human health and the environment requires that Final remedies address these issues (i.e., potential future human exposure scenarios, future land and groundwater uses, and ecological receptors).

Duration / Applicability of EI Determinations

EI Determinations status codes should remain in RCRIS national database ONLY as long as they remain true (i.e., RCRIS status codes must be changed when the regulatory authorities become aware of contrary information).

Site Background:

The Axalata (formerly DuPont) facility is located in Toledo and bordered by residential properties to the west railroad right of way and industrial properties to the northwest, and industrial/commercial/residential properties to the east and south (Figure1). The facility was acquired by DuPont in 1934, which at the time was the Mountain Varnish and Color Works Company. In 1978, DuPont bought adjacent land owned by Peterson Engineering and expanded the site to the current boundaries. The site manufactured resins and automotive paints from 1917 to 1994. Adhesive, ink, and Teflon® were also mixed for short times during this period. The site is 35.5 acres in size. The northern portion of the property is referred to as Dibble Park and was an open area to the public and previously used as a picnic/lunch location for plant employees. It recently was used to walk dogs and a cut through for students. Recently, the Dibble Park has been cut off to the public with the gates welded shut and fencing repaired to limit access to maintenance employees of Axalta. The plant proper has a 9 foot chain link fence around it with a locked gate and a guard house off the Tremainsville Road entrance (Figure 2).

Currently, the site manufactures resins to support other DuPont paint-producing facilities and provides storage for the DuPont Mount Clemens plant. On May 2, 2013 the DuPont Toledo site became Axalta Coating Systems.

2. Are groundwater, soil, surface water, sediments, or air **media** known or reasonably suspected to be **"contaminated"**[1] above appropriately protective risk-based "levels" (applicable promulgated standards, as well as other appropriate standards, guidelines, guidance, or criteria) from releases subject to RCRA Corrective Action (from SWMUs, RUs or AOCs)?

	Yes	No	?	Rationale / Key Contaminants
Groundwater	X			Metals and some semi-volatile organics (SVOCs) and volatile organics (VOCs) exceed Risk Screening Levels (RSLs) or Maximum Contaminant Levels (MCLs).
Air (indoors) [2]		X		Volatile organic compounds (VOCs) detected in groundwater that exceed screening levels do not extend under occupied on-site buildings or within 100 feet of an occupied building.
Surface Soil (e.g., <2 ft)	X			Lead and Arsenic and some Semi-Volatile Organic Compounds (SVOCs) exceed RSLs
Subsurf. Soil (e.g., >2 ft)	X			Organics and metals exceed RSLs in subsurface soil.
Sediment	X			Arsenic and SVOCs were identified in Tifft Creek sediment samples in exceedance of screening criteria.
Surface Water	X			Arsenic was above risk screening levels
Air (outdoors)		X		Shallow soil and groundwater impacts are in areas covered by concrete and asphalt.

---

[1] "Contamination" and "contaminated" describes media containing contaminants (in any form, NAPL and/or dissolved, vapors, or solids, that are subject to RCRA) in concentrations in excess of appropriately protective risk-based "levels" (for the media, that identify risks within the acceptable risk range).

[2] Recent evidence (from the Colorado Dept. of Public Health and Environment, and others) suggest that unacceptable indoor air concentrations are more common in structures above groundwater with volatile contaminants than previously believed. This is a rapidly developing field and reviewers are encouraged to look to the latest guidance for the appropriate methods and scale of demonstration necessary to be reasonably certain that indoor air (in structures located above (and adjacent to) groundwater with volatile contaminants) does not present unacceptable risks.

If no (for all media) - skip to #6, and enter "YE," status code after providing or citing appropriate "levels," and referencing sufficient supporting documentation demonstrating that these "levels" are not exceeded.

If yes (for any media) - continue after identifying key contaminants in each "contaminated" medium, citing appropriate "levels" (or provide an explanation for the determination that the medium could pose an unacceptable risk), and referencing supporting documentation.

If unknown (for any media) - skip to #6 and enter "IN" status code.

References: A Summary of Studies conducted at the site is in Section 4.0 and Appendices A-E of the *Environmental Indicator Determination Report (725), Parsons Consultants, January, 2010.*

Groundwater/Hydrogeology:

The thickness of the glacial drift ranges between 10 to 88 feet below grade. The variation is related primarily to bedrock topography and secondarily to stream incision. The glacial drift near the site consists of till with small localized pockets of coarse-grained lacustrine beach sands. Silt (30%) and clay (45%) are the dominant particle size. The till-derived soils have a low to very low permeability. Overlying the glacial till deposits are an estimated 10 to 20 feet of fine-grained lacustrine sediments consisting predominantly of silt (65%) and clay (28%). The contact between the lacustrine and till sediments is often difficult to distinguish.

A-Zone
- Uppermost layer
- Comprised of fill and sands

B-Zone
- Under A-Zone
- Dark gray, silty clay

C-Zone
- Under B-Zone
- Soft clayey silt with trace amounts of sand and fine gravel

D-Zone
- Under C-Zone
- Till (gray to light gray silt with trace amounts of fine gravel)

Bedrock-Zone

Shallow groundwater is not used for drinking water or irrigation at or near the site; however, as a conservative approach, USEPA Regional Screening Levels (RSLs) for Tap Water were used for screening. Maximum Contaminant Levels (MCLs) were used where RSLs were unavailable. The RSL represents a combined exposure including inhalation of volatile compounds and ingestion for residential tap water. For purposes of this evaluation, RSLs were based on an excess cancer risk of 10^{-6} (1 in 1 million) and a hazard quotient of 1 for non-cancer effects.

Although, shallow groundwater is not used for domestic use, groundwater from the A-Zone (the shallowest groundwater zone at the site) may discharge to the former Tifft Creek and Blodgett Ditch. Therefore, groundwater concentrations from down-gradient perimeter wells were also compared to Ohio EPA surface water criteria to assess the effects on potential recreational users of the creek down-gradient of the site. The surface water quality criteria are based on protection of human health (non-drinking water).

Groundwater Contaminant A-Zone (shallowest)	Maximum Concentration (µg/l)	Tap Water RSL (µg/l)
Benzo(a)anthracene	1.0	0.02
Benzo(b)fluoranthene	56	0.02
Benzo(a)pyrene	2.0	0.002
Bis(2-ethylhexyl)phthalate	7	4.8
Ideno (1,2,3-CD) Pyrene	1.0	0.02
Chloroform	1.0	0.19
Arsenic	11.1	0.045
Cadmium	1240	18
Lead	491	15 (MCL)
Thallium	9.4	2
Manganese	2720	880

Groundwater Contaminant B-Zone (Intermediate)	Maximum Concentration (µg/l)	Tap Water RSL (µg/l)
Benzo(a)anthracene	1.0	0.02
Benzo(b)fluoranthene	0.041	0.02
Benzo(a)pyrene	0.2	0.002
Bis(2-ethylhexyl)phthalate	19	4.8
Ideno (1,2,3-CD) Pyrene	1.0	0.02
Arsenic	760	0.045
Benzene	0.5	0.41, 5 (MCL)
Lead	*(14.3)	15 (MCL)
Thallium	2.2	2

*Slightly below MCL

Groundwater Contaminant D-Zone (Deepest)	Maximum Concentration (µg/l)	Tap Water RSL (µg/l)
Benzo(a)anthracene	0.055	0.02
Benzo(b)fluoranthene	0.14	0.02
Benzo(a)pyrene	0.075	0.002
Bis(2-ethylhexyl)phthalate	17	4.8
Ideno (1,2,3-CD) Pyrene	0.1	0.02
Chloroform	1.0	0.19
Arsenic	20.9	0.045
Cadmium	25.7	18
Lead	79.5	15 (MCL)

Surface/Subsurface Soil:

On-site surface and subsurface soil contaminant concentrations were compared to USEPA RSLs for industrial soil. Soil and sediment concentrations from Dibble Park were compared to USEPA RSLs for residential soil because youth trespassers had previously cut across the Dibble Park area as a short cut to school, but currently do not due to the gates welded shut and fence repair. Like the RSLs for groundwater, the industrial and residential soil RSLs represent a combined exposure including inhalation of particulates and volatile compounds, dermal absorption, and ingestion. For purposes of this evaluation, RSLs were based on an excess cancer risk of 10^{-6} (1 in 1 million) and a hazard quotient for noncancer effects of 1.

Surface Soil Contaminant At Facility (0 -2 feet)	Maximum Concentration (mg/kg)	RSL (mg/kg)
Benzo(a)anthracene	2.2	2.1
Benzo(b)fluoranthene	3.0	2.1
Benzo(a)pyrene	21.0	0.21
Dibenz(A,H)anthracene	3.30	0.21
Ideno (1,2,3-CD) Pyrene	12.0	2.1
Arsenic	199	9.93
Lead	23,100	800

Subsurface Soil Contaminant At Facility (>2 feet)	Maximum Concentration (mg/kg)	RSL (mg/kg)
Benzo(a)pyrene	1.6	0.21
Dibenz(A,H)anthracene	0.28	0.21
Ethylbenzene	1900	29
Xylenes	7400	2600
Napthalene	58.0	20.0
Arsenic	24	9.93
Lead	856	800

Surface Soil Contaminant in Dibble Park (0 -2 feet)	Maximum Concentration (mg/kg)	RSL (mg/kg)
Benzo(a)anthracene	1.70	0.150
Benzo(b)fluoranthene	2.20	0.150
Benzo(a)pyrene	1.40	0.015
Dibenz(A,H)anthracene	0.039	0.015
Ideno (1,2,3-CD) Pyrene	1.20	0.15
Arsenic	19.0	9.93
Lead	16,900	400

Subsurface Soil Contaminant in Dibble Park (> 2 feet)	Maximum Concentration (mg/kg)	RSL (mg/kg)
Benzo(a)anthracene	0.640	0.150
Benzo(b)fluoranthene	1.20	0.150

Benzo(a)pyrene	0.700	0.015
Ideno (1,2,3-CD) Pyrene	0.680	0.15
Arsenic	15.7	0.390

Surface Water/Sediment:

The site is located approximately four miles northwest of the Maumee River and approximately six miles west of Maumee Bay of Lake Erie. Blodgett Ditch, an underground storm sewer line also referred to as Blodgett Creek, runs through the southern portion of the site (Figure 2). Tifft Creek flowed from west to east through the The Tifft Creek channel which is approximately 3 feet deep and 6 feet wide and was located approximately 250 feet north of the plant area. Tifft Creek formerly flowed from west to east through Dibble Park; the City of Toledo redirected the creek and it now the flow in the remaining creek bed is intermittent and occurs only during flooding events. This barrier diverts the flow of Tifft Creek around the site to the north along the railroad track west of the site. Thus, potential storm water flow into the creek can only occur during severe storm events when storm water would flow over the barrier. Tifft Creek has been designated by the OEPA in Rule 3745-1-07 of the Ohio Administrative Code (OAC) (Water Use Criteria and Designations) as a limited resource water (LRW) with a designation of small drainage way maintenance for agricultural and industrial water supply and secondary contact recreation.

Sediment Tift Creek	Maximum Concentration (mg/kg)	RSL (mg/kg)
Benzo(a)anthracene	1.20	0.150
Benzo(b)fluoranthene	2.70	0.150
Benzo(a)pyrene	1.80	0.0150
Dibenz(A,H)anthracene	0.350	0.0150
Ideno (1,2,3-CD) Pyrene	1.50	0.150
Arsenic	10.6	0.39

Surface Water	Maximum Concentration (mg/kg)	RSL (mg/kg)
Arsenic	10.6	0.39

3. Are there **complete pathways** between "contamination" and human receptors such that exposures can be reasonably expected under the current (land- and groundwater-use) conditions?

Summary Exposure Pathway Evaluation Table

Potential **Human Receptors** (Under Current Conditions)

"Contaminated" Media	Residents	Industrial Workers	Day-Care	Construction	Trespassers/ Visitors	Recreation	Food[3]
Groundwater	No	**No**	No	**Yes**	No	No	No
~~Air (indoors)~~							
Soil (surface, e.g., <2 ft)	No	**Yes**	No	**Yes**	**Yes**	No	No
Soil (subsurface e.g., >2 ft)	No	No	No	**Yes**	No	No	No
Surface Water	No	**Yes**	No	**No**	**Yes**	No	No
Sediment	No	**Yes**	No	**No**	**Yes**	No	No
~~Air (outdoors)~~							

Instructions for Summary Exposure Pathway Evaluation Table:

1. Strike-out specific Media including Human Receptors' spaces for Media which are not "contaminated" as identified in #2 above.

2. enter "yes" or "no" for potential "completeness" under each "Contaminated" Media -- Human Receptor combination (Pathway).

Note: In order to focus the evaluation to the most probable combinations some potential "Contaminated" Media - Human Receptor combinations (Pathways) do not have check spaces ("___"). While these combinations may not be probable in most situations they may be possible in some settings and should be added as necessary.

___ If no (pathways are not complete for any contaminated media-receptor combination) - skip to #6, and enter "YE" status code, after explaining and/or referencing condition(s) in-place, whether natural or man-made, preventing a complete exposure pathway from each contaminated medium (e.g., use optional Pathway Evaluation Work Sheet to analyze major pathways).

If yes continue after — **X** (pathways are complete for any "Contaminated" Media - Human Receptor combination) - providing supporting explanation.

If unknown "IN" status — ___ (for any "Contaminated" Media - Human Receptor combination) - skip to #6 and enter code.

Current Conditions Report, DuPont Automotive Products Facility, Toledo, Ohio, Corporate Remediation Group, DuPont and URS Diamond, August 2008.

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[3] Indirect Pathway/Receptor (e.g., vegetables, fruits, crops, meat and dairy products, fish, shellfish, etc.)

References: *Environmental Indicator Determination Report (725) DuPont Automotive Products Facility, Toledo, Ohio, Parsons Consultants, January, 2010.*

4th Quarter 2010 Status Report DuPont Toledo Plant, Toledo, Ohio; Soil Sampling Summary, Parsons Consultants, January 2011.

Rationale:

Groundwater - The potential for exposure to groundwater is low because it is not used on-site for potable or industrial purposes. In addition, residential users have not been identified within a one-mile radius of the site and homes are on city water. However, due to the shallow depth of groundwater in some portions of the site, exposure may occur during construction/excavation activities. Potentially complete exposure pathways for a construction/excavation worker may include: incidental ingestion of and dermal contact with groundwater.

Surface Soil - The potential for exposure to contaminants in surface soils is present for on-site receptors in the Dibble Park area and portions of the manufacturing facility. In the Dibble Park area youths have previously cut across the Dibble Park area as a short cut to school, but currently they do not due to the gates welded shut at the east and west ends and fence repair. Potentially complete exposure pathways for maintenance worker (lawn maintenance) and trespassers may include: incidental ingestion of and dermal contact with surface soil and inhalation of soil-derived particulates. The surface soil exposure in the manufacturing area is mitigated in areas covered by asphalt, concrete, or a building. Industrial workers and constructions workers may be exposed to contaminated surface soil in AOC 5 and some portions of AOC 7. Potentially complete exposure pathways for maintenance worker and the construction worker may include: incidental ingestion of and dermal contact with surface soil and inhalation of soil-derived particulates.

Subsurface Soil - Subsurface soil contamination is found on-site, and exposure to subsurface soil is achieved during excavation and construction activities. Potentially complete exposure pathways for construction workers may include incidental ingestion of and dermal contact with subsurface soil and inhalation of soil-derived particulates and vapors. VOCs were detected in the subsurface soil at samples S32-4 and BS-10 and the areas have no buildings above and the vapor exposure pathway is cut off due to asphalt and concrete above these areas.

Sediment - Five PAHs and arsenic were detected in sediment samples in Tifft creek at concentrations exceeding the screening criteria. Industrial workers and trespassers can potentially contact sediment in Tifft Creek. Potentially complete exposure pathways for industrial workers and trespassers may include: incidental ingestion of and dermal contact with sediment and inhalation of sediment particulates.

Surface Water- Surface water data collected from Tifft Creek during previous environmental investigations showed arsenic exceeding the applicable surface water criteria. Potentially complete exposure pathways for industrial workers and trespassers may include: incidental ingestion of and dermal contact with surface water and inhalation of surface water.

4. Can the **exposures** from any of the complete pathways identified in #3 be reasonably expected to be **"significant"**[4] (i.e., potentially "unacceptable" because exposures can be reasonably expected to be: 1) greater in magnitude (intensity, frequency and/or duration) than assumed in the derivation of the acceptable "levels" (used to identify the "contamination"); or 2) the combination of exposure magnitude (perhaps even though low) and contaminant concentrations (which may be substantially above the acceptable "levels") could result in greater than acceptable risks)?

___ If no (exposures cannot be reasonably expected to be significant (i.e., potentially "unacceptable") for any complete exposure pathway) - skip to #6 and enter "YE" status code after explaining and/or referencing documentation justifying why the exposures (from each of the complete pathways) to "contamination" (identified in #3) are not expected to be "significant."

X If yes (exposures could be reasonably expected to be "significant" (i.e., potentially "unacceptable") for any complete exposure pathway) - continue after providing a description (of each potentially "unacceptable" exposure pathway) and explaining and/or referencing documentation justifying why the exposures (from each of the remaining complete pathways) to "contamination" (identified in #3) are not expected to be "significant."

___ If unknown (for any complete pathway) - skip to #6 and enter "IN" status code

References:

Rationale:

Groundwater. Groundwater for potable purposes is not used at or in the near vicinity of the Site. However, there is a potential that construction workers engaged in excavation activities may encounter the water table. A potential exposure of construction workers to impacted groundwater may be significant due to high levels of cadmium, arsenic, lead and chloroform in the A-zone.

Surface soil - Exposure pathways for surface soil are present at the site in the Dibble Park area and the manufacturing area. The two highly elevated lead surface soil samples in Dibble Park were delineated to show samples in four directions around the elevated samples below RSL levels in surface soils (Parsons, 2011). The exposures are not significant for an industrial worker and a construction worker in portions of the manufacturing area due to an asphalt, and/or concrete cover or a building foundation. However, the exposure to high concentration of lead in surface soil may be significant to maintenance worker and trespassers.

Subsurface soil - Exposure pathways for subsurface soil are present at the site in manufacturing area. VOCs, metals and SVOC s exceed the generic screening criteria. A potential exposure of construction workers to impacted subsurface soil may be significant.

Sediment - - Exposure pathways for sediment are present at the site in Tifft Creek in the Dibble Park area. There are contamination levels exceeding risk screening levels for most significantly Arsenic, along with

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[4] If there is any question on whether the identified exposures are "significant" (i.e., potentially "unacceptable") consult a human health Risk Assessment specialist with appropriate education, training and experience.

SVOCs in the sediment in Tifft Creek. However, these screening levels are based on conservative exposure duration of 25 years with an exposure frequency of 250 days per year. Since the Tifft creek is dry most of the year and no likely potential receptors for the stream have been identified, an actual exposure to the contaminated sediment is expected to less significant.

Surface Water - Industrial workers and trespassers can potentially contact surface water in Tifft Creek. Tifft Creek is not used as a drinking water source, and sample results show one VOC, 1 SVOC, and 8 metals were detected in surface water in the former Tifft Creek. Only arsenic was detected at concentrations exceeding the screening level. Tifft Creek has been designated by the Ohio EPA in Rule 3745-1-07 of the Ohio Administrative Code (OAC; Water Use Criteria and Designations) as a limited resource water (LRW) with a designation of small drainage-way maintenance for agricultural and industrial water supply and secondary contact recreation. In comparison to the Ohio EPA Surface Water Criteria for a non-drinking water human receptor, the maximum arsenic concentration detected did not exceed this screening value. Given this data, the surface water is not expected to be a significant exposure.

5. Can the "significant" **exposures** (identified in #4) be shown to be within **acceptable** limits?

X — If yes (all "significant" exposures have been shown to be within acceptable limits) - continue and enter "YE" after summarizing and referencing documentation justifying why all "significant" exposures to "contamination" are within acceptable limits (e.g., a site-specific Human Health Risk Assessment).

— If no (there are current exposures that can be reasonably expected to be "unacceptable")- continue and enter "NO" status code after providing a description of each potentially "unacceptable" exposure.

— If unknown (for any potentially "unacceptable" exposure) - continue and enter "IN" status code

Rationale and Reference(s):

Groundwater. Groundwater for potable purposes is not used at or in the near vicinity of the site. However, there is a potential that construction workers engaged in excavation activities may encounter the water table. To help mitigate theses exposures a health and safety policy and procedures are employed at the facility to protect against construction worker exposures. The purpose of the health and safety policies and procedures is to ensure that appropriate measures are taken for personnel protection should such subsurface activity encounter impacted groundwater (e.g., PPE).

Surface Soil: Arsenic and lead in the surface soil are the risk drivers for the on-site surface soil with in the uncovered areas of AOC-5 and AOC 7. However, current exposures are under control since workers are prevented from exposure to contaminated soil due to an incomplete pathway. An internal fence separates AOC-5 and AOC-7 from the manufacturing area. Institutional controls are in place to ensure the appropriate personal protective equipment (PPE) is used if soil is disturbed, which eliminates the exposure to surface soil for construction workers.

Lead at a highest concentration of 16,900 ppm is a risk driver for the surface soil at the Dibble Park. The workers and the trespassers have the highest potential for exposure to surface contamination. However, for trespassers the exposure frequency to contamination is expected to be significantly reduced due to the following measure. In Dibble Park, the gates have been welded shut at the east and west ends and the holes in the fencing repaired to restrict access to the public. The maintenance worker's exposure is considered to be 20 days a year based on lawn-mowing responsibilities. The direct contact pathway is expected to be insignificant due to the use of tractor for mowing the 17 acre exposure area.

The surface soil contamination associated with elevated levels of metals and VOCs, and SVOCs in on-site areas and Dibble Park will be eliminated as part of the final remedy.

Subsurface soil - Exposure pathways for subsurface soil are present at the site in manufacturing area. Construction or excavation workers may be significantly exposed to elevated levels of contaminants (eg., Ethyl Benzene and Arsenic) in subsurface soil. To help mitigate theses exposures a health and safety policy and procedures are employed at the facility to protect against construction worker exposures. The purpose of the health and safety policies and procedures is to ensure that appropriate measures are taken for personnel protection should such subsurface activity encounter impacted soils (e.g., PPE).

Sediment - - Exposure pathways for sediment are present at the site in Tifft Creek in the Dibble Park area. There are contamination levels exceeding risk screening levels for most significantly Arsenic, along with

SVOCs in the sediment in Tifft Creek. A quantitative risk evaluation based on limited exposure duration and exposure frequency of potential receptors to the sediment found the cumulative excess cancer risk to be below 1 in 100,000 and below a hazard index of 1 for non-cancer risk.

6. Check the appropriate RCRIS status codes for the Current Human Exposures Under Control EI event code (CA725), and obtain Supervisor (or appropriate Manager) signature and date on the EI determination below (and attach appropriate supporting documentation as well as a map of the facility):

X YE - Yes, "Current Human Exposures Under Control" has been verified. Based on a review of the information contained in this EI Determination, "Current Human Exposures" are expected to be "Under Control" at the Axalta facility, EPA ID No. OHD 005 041 843, located in Toledo, Ohio under current and reasonably expected conditions. This determination will be re-evaluated when the Agency/State becomes aware of significant changes at the facility.

___ NO - "Current Human Exposures" are NOT "Under Control."

___ IN - More information is needed to make a determination.

Completed by	(signature)		Date	8/19/14
	(print)	Christopher J Black		
	(title)	Environmental Scientist		

Supervisor	(signature)		Date	8/19/14
	(print)	Tammy Moore		
	(title)	Section Chief		
	(EPA Region or State)	EPA Region 5		

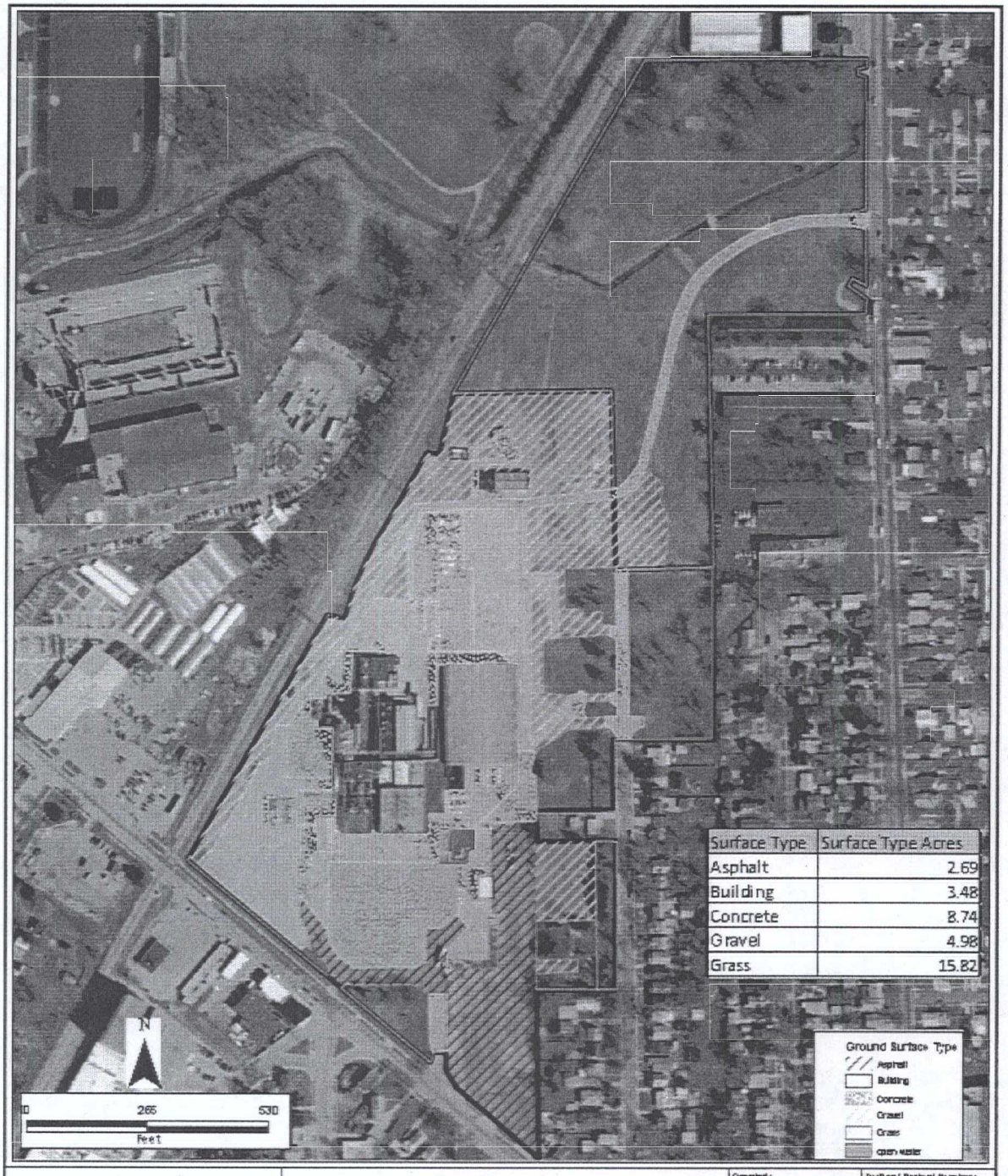
Locations where References may be found:
RCRA 7th Floor File Room, EPA Region 5 Office, 77 W. Jackson Blvd., Chicago, IL

Contact telephone and e-mail numbers

(name)	Christopher J Black
(phone #)	(312) 886-1451
(e-mail)	black.christopher@epa.gov

FINAL NOTE: THE HUMAN EXPOSURES EI IS A QUALITATIVE SCREENING OF EXPOSURES AND THE DETERMINATIONS WITHIN THIS DOCUMENT SHOULD NOT BE USED AS THE SOLE BASIS FOR RESTRICTING THE SCOPE OF MORE DETAILED (E.G., SITE-SPECIFIC) ASSESSMENTS OF RISK.

FIGURE 1



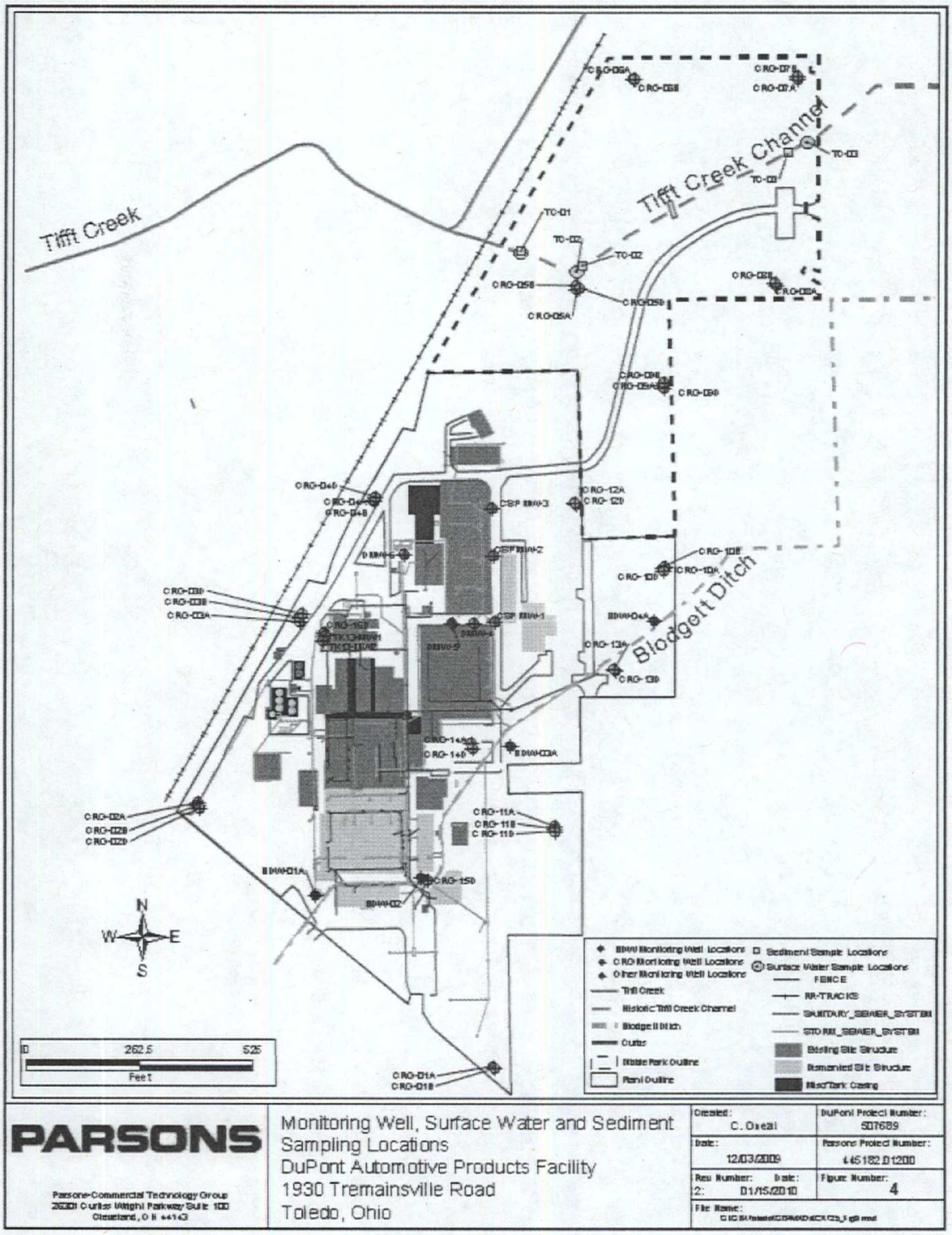
PARSONS

Parsons-Commercial Technology Group
25201 Chagrin Wright Parkway Suite 100
Cleveland, OH 44143

Land Surface Map
DuPont Automotive Products Facility
1930 Tremainsville Road
Toledo, Ohio

Created: C. Oneal	DuPont Project Number: 507689
Date: 11/24/2009	Parsons Project Number: 445182.D1200
Rev Number: 3 Date: D1/15/2010	Figure Number: 3
File Name:	

FIGURE 2



PARSONS Parsons-Commercial Technology Group 2630 Curtiss Wright Parkway Suite 100 Cleveland, OH 44143	Monitoring Well, Surface Water and Sediment Sampling Locations DuPont Automotive Products Facility 1930 Tremainsville Road Toledo, Ohio	Created: C. Oneal	DuPont Project Number: 507689
		Date: 12/03/2009	Parsons Project Number: 445182.01200
		Rev Number: Date: 2: 01/15/2010	Figure Number: 4
		File Name: C:\IC\Projects\CRO\MXD\ICR725_Fig2.mxd	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

APR 0 5 2007

REPLY TO THE ATTENTION OF: DE-9J

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

OHD005041843
DUPONT TOLEDO PLANT
400 GROESBECK HWY
MT CLEMENS, MI 48043

RE: OHD005041843
DUPONT TOLEDO PLANT

Dear Plant Manager/President:

The Ohio Environmental Protection Agency (OEPA) and the United States Environmental Protection Agency (U.S. EPA) have compiled a list of all facilities deemed appropriate and important to address using the Resource Conservation and Recovery Act's (RCRA) Corrective Action Program. Because this set of 3,880 facilities has national remediation goals which will culminate in the year 2020, it is referred to as the 2020 Corrective Action Universe. **Your facility is part of this 2020 Universe.**

As a result, the OEPA and U.S. EPA expect that a final remedy will be in place (i.e. remedy construction completed) at your facility by 2020 (although actual attainment of cleanup goals through remedy implementation may take a while longer). If we have not already done so, we will be working with you to develop a plan and a schedule that achieves this goal before 2020.

Your facility has been included in the 2020 Universe because ***one or more of the following is true:***

- It already belongs to the 2008 Corrective Action Baseline,
- It has a RCRA permit obligation,
- OEPA and U.S. EPA agreed that it needs to be addressed under the RCRA Corrective Action Program.

Inclusion on this list does not imply failure on your part to meet any legal obligation, nor should it be construed as an adverse action against you. It only means that OEPA and U.S. EPA have identified your facility—and every other facility in the 2020 Universe—as needing to complete RCRA Corrective Action if they have not done so already. Our national program goal is to largely address these cleanup obligations before the end of 2020. Accordingly, progress will be tracked for each facility in the 2020 Universe. The list of facilities will be posted on our web site at http://www.epa.gov/correctiveaction on April 16, 2007.

U.S. EPA Region 5 will work to address remediation concerns at your facility in a manner consistent with your plans for the property. If you believe that facility-wide corrective actions are already complete for your site, or if you have any questions regarding this letter, please contact Christopher Black at (312) 886-1451.

Sincerely,

Jose G. Cisneros, Chief
Waste Management Branch

REFERENCES

DuPont Reports:

DuPont. June 18, 1993. *DuPont Toledo Partial Closure Certification.*

DuPont. July 16, 1996. *Phase I Environmental Assessment* DuPont Automotive Products.

DuPont. April 2003. *Investigation Report* DuPont Automotive Products Facility.

Bowser-Mourner, Inc. January 15, 2003. *Site Investigation 2002.* **(Data package for report above).**

DuPont. January 23, 2004. *Draft Site Investigation Report.*

DuPont. June, 2004. *SWMU 13 and SWMU 32 Risk Assessment.* **(Internal draft – not included because it was not submitted to OEPA due to change to State Risk Assessment Guidance).**

DuPont. August 2006. *Phase II Property Assessment North and Southeast Sections, Dibble Park Toledo, Ohio.* Wilmington, Delaware.

DuPont. August 2007. *Groundwater Sampling and Analysis for PFOA and APFO for DuPont Toledo Plant.* Toledo, Ohio.

DuPont. July 2007. *Data Summary Report for Tank 13 DuPont Automotive Products Facility Toledo, Ohio.* Wilmington, Delaware.

DuPont. July 2007. *Data Summary Report for the Container Storage Pad DuPont Automotive Products Facility Toledo, Ohio.* Wilmington, Delaware.

DuPont Data Packages:

DuPont. December 22, 2003. *Site Investigation-Soil DuPont Toledo Plant, Part 1 and 2.*

DuPont. November 6, 2003. *Dibble Park Investigation.*

DuPont. January 7, 2004. *Site Investigation GW 11/03, Part 1and 2.*

DuPont. July 7, 2004. *Site Investigation Groundwater 2Q04.*

DuPont. November 3, 2004. *Toledo Site Investigation – GW3Q04.*

DuPont. April 20, 2005. *Site Investigation GW1Q05.*

DuPont. August 2, 2005. *Site Investigation GW2Q05.*

DuPont. July 19, 2004. *DuPont Toledo Dibble Park Soils June 2004.* Toledo Automotive Plant, Toledo Ohio.

Lancaster Laboratories 2003. *Dibble Park Investigation TC Samples 8/03.*

Non-DuPont Reports:

Dragun Corporation Environmental Consultants. May 21, 2007. *10,000-Gallon Underground Storage Tank Closure Site Assessment Report DuPont Performance Coatings Toledo Plant.* Farmington Hills, Michigan.

Dragun Corporation Environmental Consultants. May 22, 2007. *Site Assessment Report In-Place Closure of Six Underground Storage Tanks DuPont Performance Coatings Toledo Plant.* Farmington Hills, Michigan.

Dragun Corporation. May 7, 2004. *Site Check Report.* DuPont Toledo Plant. Toledo, Lucas County, Ohio.

Enviroscan, Inc. October 15, 2002. *Final Report Phase I Geophysical Survey Infrastructure Detection/Tracing and Suspected Disposal Area Delineation* DuPont Automotive Products Toledo, Ohio Enviroscan Project Number 090204. Lancaster, Pennsylvania.

Enviroscan, Inc. October 15, 2002. *Final Report Phase II Geophysical Survey Shallow Sand Thickness Mapping DuPont Automotive Products Toledo, Ohio Enviroscan Project Number 090204b Revised.* Lancaster, Pennsylvania.

Enviroscan, Inc. October 29, 2003. *Final Report Geophysical Survey Utility/Structure Clearance, Approximately 20 boring Location. Metallic Debris Detection/Delineation, Approx. 14-acre Area.* DuPont Automotive Products, Toledo, OH

Enviroscan. December 30, 2002. *Final report Phase III Geophysical Survey Boring Location Clearance, and Geophysical Well Logging* DuPont Automotive Products, Toledo, Ohio

Haztech, Inc. July 8, 1987. *Report on the Findings of the Metal Detection Survey Performed at the DuPont Toledo Facility.* Sylvania, Ohio.

Heritage Environmental Services, Inc. April 18, 1995. *Waste Storage Tank Closure Report Tank #W-1 E.I. du Pont de Nemours & Company Toledo AP Plant.* Toledo, Ohio.

Heritage Remediation/Engineering, Inc. December 16, 1992. *Summary of Analytical Data for RCRA Closure of the Boiler House Area Soil Excavation Toledo Ohio Plant.* Reply Letter to Denise Trabbic-Clement, Environmental Technician at DuPont Automotive Products in Toledo, Ohio. Toledo, Ohio.

Heritage Remediation/Engineering, Inc. November 11, 1992. *Underground Storage Tank, Tank Closure Report.* Toledo, Ohio.

Heritage Remediation/Engineering, Inc. April 5, 1993. *Hazardous Waste Storage Facility Part B Closure Report Tank #14 E.I. du Pont de Nemours and Company Toledo AP Plant.* Toledo, Ohio.

Heritage Remediation/Engineering, Inc. October 6, 1993. *Closure Report for Tanks #C-2 and C-4 DuPont Automotive Product Plant Toledo, Ohio.* Toledo, Ohio.

Heritage Remediation/Engineering, Inc. September 24, 1993. Hazardous Waste Storage Facility Part B *Closure Report Tanks #C-2 and C-4 E.I. du Pont de Nemours and Company Toledo AP Plant.* Toledo, Ohio.

Heritage. March 3, 1993. *Hazardous Waste Storage Facility Part B Closure Report Tank #14.* DuPont Toledo AP Plant

Non-DuPont Data Packages:

Conoco Environmental Services. July 29, 1992. *Toledo Well Waters June/July 1992.*

Conoco Environmental Services. June 1992. *Toledo UST Removal, Lab Analysis Report.* Ponca City.

EvSD (Conoco). November 3, 1995 *TCLP-Results Waste Mgmt. Soil Cuttings.*

EvSD. November 9, 1995. *Analytical Data Report Toledo Soils 3267.*

EvSD. January 16, 1996. *Analytical Data Report Toledo Soils Project.*

Toledo Testing Laboratory, Inc. September 14, 1988. *Power House Solvent Tank.*

US EPA Permits / Permit Applications / Orders:

U.S. Environmental Protection Agency. 2002. *Consent Agreement and Final Order.* Docket No. CERCLA-05-2002-0014.

State of Ohio Permits and Permit Applications:

Ohio Department of Commerce. July 2, 2004. *DuPont North Tank Farm March 2004 Suspected Release*

State of Ohio Environmental Protection Agency (Ohio EPA). December 4, 1981. *Hazardous Waste Facility Approval Board Permit.*

Ohio EPA. December 13, 1990. *Closure Plan Approval. Hazardous Waste Storage Tanks 1-13 and 15.*

Ohio EPA. Modified September 26, 1990. *Hazardous Waste Tank Storage Facility Partial Closure Plan E.I. du Pont de Nemours and Company Toledo APD Plant.* Columbus, Ohio.

Ohio EPA. 1990. *Authorization to Discharge under the National Pollution Discharge Elimination System.*

City of Toledo. October 8, 1991. *Department of Public Utilities, Order of Wastewater Discharge.*